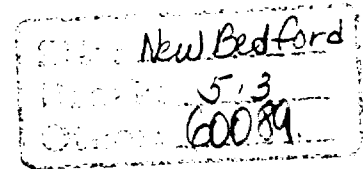




U.S. Department of Justice



Washington, D.C. 20530

June 2, 1987

Paul B. Galvani
Ropes & Gray
225 Franklin Street
Boston, Massachusetts 02110

Re: United States v. AVX Corp.,
Civ. No. 83-3882-Y (D. Mass.)

JUN 5 1987
REGION I
OFFICE OF REGIONAL COUNSEL

Dear Paul:

Aerovox's January, 1987 requests for admission ("RFAs") contain several references to documents which have not been produced to the plaintiffs and which are not otherwise available to the plaintiffs. We therefore request that you provide us with copies of the following:

- 1) "Polychlorinated Biphenyl (PCB) Movement and Transformation in Acushnet River Estuary Sediments", General Electric Research and Development Center (September 26, 1986). This report is cited in two reports submitted by Aerovox, one by Maxim and one by Eisenreich, and is presumably the report referred to in John Brown's April 16, 1987 letter to E.C. Jordan, a copy of which is attached;
- 2) all documents recording the analyses and results of analyses of samples to be relied on by Aerovox, including specifically:
 - i) the "mass spectra" chromatograms referred to in Aerovox's RFAs 19291, 19301 and 19357;
 - ii) all chromatograms and results from the analyses of all standards, and of blanks, duplicates or other quality control analyses accompanying the analyses of the New Bedford Harbor samples, to be relied on by Aerovox, which were taken in the sampling described in RFAs 19287-289 and 20354-373;
 - iii) documentation of the dates of the analyses of standards and quality control samples referred to in paragraph ii above;

- iv) documentation of the analyses described in RFAs 19290-292;
 - v) documentation identifying the published values used to identify response factors, as described in RFA 19292;
 - vi) copies of chromatograms and other documentation of the identification of congener peaks, including all analyses of standards, as described in RFAs 19293-294;
 - vii) all documentation of new data collected during the investigation referred to in RFA 19301 and not included in "Appendix A", including "SP 2250/SP 2401" gas chromatograms and GC-MS ion chromatograms;
 - viii) all documents recording the use of Aroclor standards to define values for "indicator peaks" as described in RFA 19300, including documents showing what Aroclor standards were used and where they were obtained, and all documentation of the calculations described in RFAs 19299 and 19300;
 - ix) all chromatograms, protocols and other documentation relating to the analyses referred to in RFA 20375, including chromatograms of analyses of standards, blanks duplicates and any other QA/QC analyses; documentation of the values, and documentation of the dates on which such analyses were conducted;
- 3) The computer codes used by ASA in the studies on which Aerovox intends to rely, described in the summaries attached to Aerovox's RFAs in July, 1986 and January, 1987, both in the form of a hard copy listing, and a computer compatible form (either on floppy disks or on tape);
 - 4) "Figure 2.40", referred to in the list of figures in the January, 1987, ASA report as being on Page 54, but not printed on that page or anywhere else in the report;
 - 5) Records of the measurements, calculations and activities referred to in RFAs 19515-581;
 - 6) Documentation of the investigation described in Aerovox's RFAs 19889-902; and

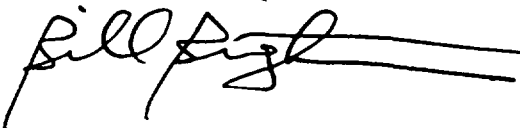
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- 7) The title and publisher of the reference in RFA 19211, "Herkullet and Kimeldorf (1977)".

I look forward to hearing from you.

Sincerely yours,

Assistant Attorney General
Land and Natural Resources Division

By: 

William D. Brighton
Attorney
Environmental Enforcement Section

cc: Susan Bernard
Charles Bering